

**LARocca HORNik ROSEN
GREENBERG & BLAHA LLP**
COUNSELORS AT LAW

THE TRUMP BUILDING
40 WALL STREET
32ND FLOOR
NEW YORK, NY 10005

212-530-4823
212-530-4815 FAX

LHRGB.COM

ANDREW G. HEGT (1977-2012)

HERITAGE PLAZA II
65 HARRISTOWN ROAD
3RD FLOOR
GLEN ROCK, NJ 07452
201-444-3531
201-444-3541 FAX

FREEHOLD COMMONS
83 SOUTH STREET
3RD FLOOR
FREEHOLD, NJ 07728
732-409-1144
732-409-0350 FAX

FRANK J. LARocca ¹⁰
JONATHAN L. HORNik
LAWRENCE S. ROSEN
ROSE GREENBERG ^Δ
ERIC PETER BLAHA
AMY D. CARLIN ^Δ
DAVID N. KITTREDGE ^Δ
PATRICK T. MCPARTLAND ^Δ
MICHELLE CRUPI

FLORENCE R. GOFFMAN ^{ΔΔ}
ERIN K. BURKE
STACEY L. MILLER ⁹
REBECCA L. BERNSTEIN [†]
JONATHAN TABAR ^Δ
MATTHEW GERBER [†]
JARED BLUMETTI
BENJAMIN PARISI
RAQUEL M. FREITAS [†]

^Δ NEW YORK BAR ONLY
¹ NEW JERSEY BAR ONLY
⁹ OF COUNSEL ATTORNEYS
^Δ CERTIFIED MATRIMONIAL LAW ATTORNEY
[†] PRACTICING AS AN LLC

DIRECT DIAL: 212.530.4822
EMAIL: LROSEN@LHRGB.COM

December 12, 2014

VIA ECF

Honorable Analisa Torres, USDJ
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Alexia Palmer v. Trump Model Management, LLC, et al.
Civil Case No.: 14 Civ. 8307

Dear Judge Torres,

We are counsel to Defendants Trump Model Management, LLC and Corrine Nicolas and write in response to the letter received today from Johanna Sanchez of Plaintiff's counsel.

Defendants have no objection to Plaintiff serving her First Request for Admissions as Rule 36 requests do not constitute discovery but serve to narrow the issues before the Court. However, Defendants do object to any discovery requests at this time including the Plaintiff's proposed subpoena to the Department of Labor. As a Rule 26(f) conference has yet to be conducted any discovery at this juncture is entirely premature.

Defendants intend to move to seek dismissal of this lawsuit in its entirety. In accordance with the Court's rules we served a letter on Plaintiff's counsel on December 9, 2014 detailing the deficiencies of Plaintiff's Complaint and the multiple bases for dismissal of each cause of action.

Very truly yours,

Lawrence S. Rosen

cc: Naresh M. Gehi, Esq. (via ECF)